

### Remarks

In response to the Examiner's Office Action dated May 19, 2004, applicants have amended independent claims 1, 12, 23, 55, and 65 to 67 and also various dependent claims. Applicants have further canceled claims 24 to 26 and 45 to 54 and have added new dependent claims 68 to 82 and new independent claims 83 to 85. No new matter has been added as a result of these amendments.

As a result of the amendments, applicants believe that the claims are now patentably distinct from the prior art references raised by the Examiner. The main distinction between the present invention and the prior art reference Koeppel et al (US 6,477,575) can be readily seen when comparing figure 1 of the present application with figure 1 of Koeppel. Figure 1 of Koeppel shows clients 150 communicating over network 140 with network environment 100. Network environment 100 comprises web server 110 coupled to user event data store 120, content data store 130 and analysis system 170. It is clear in Koeppel that the content personalization system is part of the back office of web server 110. In other words, a user of client 150 requests web content by transmitting a client request to web server 110 in a conventional manner. Web server 110, in conjunction with data stores 120, 130 and analysis system 170, then provides personalized content to client 150.

In contrast, figure 1 of the present invention shows a client equipment unit 2 communicating with a content provider 10 via data manipulation server 4 which is disposed in-line between client equipment unit 2 and content providing server 10. The content personalization of the present invention is performed by data manipulation server 4 and this is clearly not a back office system of content providing server 10. Indeed, content providing server 10 may be entirely conventional and incapable of providing content personalized to the user of client equipment unit 2.

Applicants appreciate that the Examiner has disagreed with the applicants' interpretation of the limitation "disposal in-line" and like limitations. To further clarify the claims and to further bring out the fundamental distinctions between the present invention and Koeppel, applicants have amended the claims as will now be explained:-

Claims 1-22 and 55 to 82

In some embodiments of the present invention, data manipulation server 4 personalizes the content provided by intercepting a request message for obtaining the content sent by client equipment 2 and addressed to content providing server 10. Claims 1 to 22 and 55 to 82 are directed to these embodiments.

To more clearly distinguish the present invention over the prior art references cited by the Examiner, these claims have been amended to recite the feature that

*data communicated between the client equipment unit and the content providing server is modified in response to intercepting a request message for obtaining content, the request message being transmitted from the client equipment unit and addressed to the content providing server*

and like features. It is quite clear that in Koeppel and in any of the other prior art references cited, clients 150 send request messages for obtaining web content to web server 110 and not to data store 130. Thus, on the Examiner's interpretation of Koeppel, there is no request message addressed to the content providing server and modification is not performed in response to intercepting such a request message. Rather, request messages from clients 150 are addressed and sent to web server 110 (which the Examiner equates to the data manipulation server) in a wholly conventional manner. Thus, these claims are not anticipated by the prior art for at least this reason.

In some variants of the embodiment of the present invention discussed above, the modified data is data providing the content - for example a web page. Claims 4, 5, 15, 16, 58 and 59 are related to this feature. In other variants, the modified data is the request message itself. In other words, the request message itself is modified to be more personalized to the user prior to being received by the content providing server. Claims 2, 3, 13, 14, 56 and 57 are directed to this feature. There is no disclosure whatsoever in Koeppel or in any of the other prior art references cited of modifying the request message sent by a client equipment unit and addressed to a content providing server as claimed. Thus, these claims are not anticipated by the prior art for at least this reason.

Turning to consider independent claims 83 to 85, the Examiner will see that each of these claims are directed to

*intercepting and modifying content data communicated from the content providing server to the client equipment unit, the content data being communicated in response to a request message being transmitted from the client equipment unit to the content providing server for obtaining content.*

As discussed above, on the Examiner's interpretation of Koeppel, there is no request message transmitted from a client equipment unit to a content providing server for obtaining the content, and no interception or modification of content data communicated from the content providing server to the client equipment unit is performed in response to such a request message being transmitted. Similarly, none of the other prior art references cited disclose such features. Thus, these claims are also not anticipated by the prior art references cited.

Turning to claim 23, the Examiner will see that the claims are now directed to

*the content providing server apparatus transmitting content data to a client equipment unit in response to the client equipment unit transmitting to the content providing server a request message for obtaining the content.*

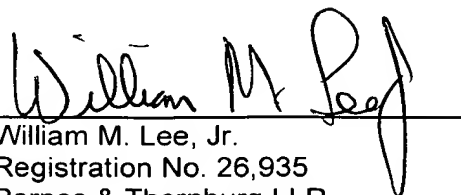
Thus, it is submitted that these claims are not anticipated by the prior art references cited for the reasons discussed above.

The advantages of the present invention over prior art approaches such as Koeppel have already been discussed in the previous response. Since a user of a client equipment unit will typically access a very large number of different content providing servers, if each of those content providing servers operate a back-office content personalization system, such as the Koeppel system, data relating to the user will be stored in many different places and may be inconsistent between different content personalization systems resulting in an inconsistent user experience. By moving the content personalization mechanism to a data manipulation server disposed in-line between the client equipment unit and the content providing server, data relating to the user may be stored centrally and many different content providing servers may offer personalized content using the data manipulation server. Thus, a single set of data relating to the user is stored, resulting in increased user control and security of data. Furthermore, the user will experience a more consistent personalization of content. There is no suggestion or motivation in any of the prior art cited by the Examiner to provide a content personalization system as described and claimed in the present invention.

Accordingly, applicants believe that the application is allowable in its present form and respectfully request favorable reconsideration.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "William M. Lee, Jr.", written over a horizontal line.

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